

May 14, 2018

VIA ECFS

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20054

Re: Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to

Accelerate Investment in Broadband and Next-Generation Networks, WC Docket

No. 18-141

Dear Ms. Dortch:

The Midwest Association of Competitive Communications ("MACC")¹ respectfully files this letter in support of the Motion for Extension of Time ("Motion") filed by INCOMPAS in the above docketed proceeding. MACC was created to support and protect competition in the telecommunications markets in the mid-western United States. MACC represents the interests of its member companies before executive, judicial, administrative and other governmental bodies. MACC members provide competitive telecommunications services throughout the Midwest, as well as other areas of the country.

This proceeding could have an enormous impact on the ability of competitive carriers, including the members of MACC, to obtain the critical inputs necessary to provide service to their customers. We agree with INCOMPAS that the issues raised by USTelecom's petition are complex and require a detailed record that takes time to prepare. The Commission has previously determined that extensions are warranted when the extension is necessary to ensure that the Commission receives full and informed responses and the affected parties have an opportunity to

¹ MACC is a leading Midwest trade association of competitive carriers formed to support an environment that fosters competition in the communications marketplace. MACC members supporting this filing include Birch Communications, First Communications, Granite Telecommunications, Socket Telecom, TDS Metrocom and Allstream.

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develop a more complete record for the Commission's consideration.² Moreover, a limited extension of time, such as that proposed by INCOMPAS will not cause undue delay or prejudice for the Commission.

For the above reasons, the Commission should grant INCOMPAS' Motion for Extension of Time.

Respectfully submitted,

Paula Foley

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Communications

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² See, e.g., Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, Order at ¶ 3, DA 10-2267 (PSHSB rel. Dec. 1, 2010) (granting an extension "to ensure that all interested parties have the time necessary to prepare full and informed comments and reply comments").